

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:)	Chapter 11
)	
USG CORPORATION, A Delaware Corporation., <i>et al.</i> ,)	Jointly Administered Case No. 01-2094 (JKF)
)	
Debtors.)	
)	
USG CORPORATION, <i>et al.</i> ,)	
)	
Movant)	
)	
v.)	
)	
OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS, <i>et al.</i>)	Civil Action No. 04-1559 (JFC) Civil Action No. 04-1560 (JFC)
)	
Respondents.)	

**MOTION OF BARON & BUDD, P.C., FOSTER & SEAR, LEBLANC &
WADDELL, LLP AND SILBER PEARLMAN, LLP FOR EMERGENCY AND
EXPEDITED HEARING AND/OR TELEPHONIC HEARING ON MOTION TO
EXTEND TIME TO COMPLETE DEBTORS' STANDARD QUESTIONNAIRE
TO SELECT PERSONAL INJURY ASBESTOS CLAIMANTS**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Baron & Budd, P.C., Foster & Sear, LeBlanc & Waddell, LLP, and Silber Pearlman, LLP (or the “Movants”) respectfully move for an emergency and expedited hearing and/or telephonic hearing on their Motion to Extend Time to Complete Debtors’ Standard Questionnaire to Select Personal Injury Asbestos Claimants (the “Motion to Extend Time”), as follows:

Background

1. On June 13, September 20, and October 6, 2005, this court held hearings regarding discovery issues in this matter, including the Motion for Approval of the

Debtors' Sampling Plan and Claimant Questionnaire and the discovery schedule for the estimation of Debtors' asbestos personal injury liabilities.

2. On October 17, 2005, the Court entered its Order Re: Personal Injury Estimation [Doc. No. 62].

3. The Order Re: Personal Injury Estimation requires the Questionnaire to be returned by mail on or before January 9, 2006 to be deemed timely.

Grounds for the Motion

4. Although each of the Movants has worked diligently to complete the Questionnaires, for the reasons set forth in the Motion to Extend Time, completion of the Questionnaires by the January 9, 2006 deadline is simply not possible.

5. Because the Movants want to complete each of the Questionnaires with which they were served in compliance with the Court's Order Re: Personal Injury Estimation, the Movants respectfully an emergency and expedited hearing on their Motion to Extend Time.

6. Patrick Gunn, Cooley Godward LLP, counsel for the Debtors, has been advised that Movants are seeking an emergency and expedited hearing on their Motion to Extend Time and is prepared and available to participate in such a hearing by telephone.

Relief Requested

For the foregoing reasons, the Movants respectfully request the Court to hear their Motion to Extend Time on an expedited basis, to allow telephone participation in such expedited hearing, and to grant them such other and further relief to which the Court finds they are justly entitled.

Respectfully submitted,

/s/Daniel K. Hogan

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